

**UNITED STATES BANKRUPTCY COURT
FOR THE
DISTRICT OF MASSACHUSETTS**

In re:)	
)	Chapter 7
)	Case No. 19-11275
Joanne N. Lunn,)	
)	
Debtor)	
)	
Paula Fruman,)	
)	
Plaintiff)	Adv. P. No. 19-01092
v.)	
)	
Joanne N. Lunn,)	
)	
Debtor)	
)	

JOINT MOTION TO EXTEND/AMEND SCHEDULING ORDER

NOW COME, the Parties in the above referenced matter who respectfully request that this Honorable Court extend and amend the Court's Scheduling Order dated September 10, 2019 as follows: (1) extend the deadline to conduct an initial conference in accordance with Fed. R. Civ. P. 26(f) from October 10, 2019 to October 31, 2019; and (2) extend the deadline to file a Joint Discovery Report from October 25, 2019 to November 15, 2019.

As reasons therefore, the Parties state as follows:

1. Debtor's counsel will be out on vacation from September 28, 2019 through October 14, 2019 and without access to her office or files.
2. The Parties reserve the right to seek additional extensions of time or amendments to their Discovery Plan as may become necessary. The Parties reserve all of their rights under F.R. Civ. P. 7037 and M.L.B.R. 7037-1. Except as expressly set forth herein, no extensions of time to answer or respond are granted hereunder; and
3. The parties submit that this Motion is "a motion to which all affected parties in interest have consented" Pursuant to M.L.B.R. 9013-1(e)(2)(B). Accordingly, the Court may consider and allow this Motion prior to the expiration of any applicable objection period and without a hearing.

WHEREFORE, Plaintiff asks that this Honorable Court extend or amend the Court's Scheduling Order as follows: (1) extend the deadline to conduct an initial conference in accordance with Fed. R. Civ. P. 26(f) 2019 to October 31, 2019; and (2) extend the deadline to file a Joint Discovery Report to November 15, 2019.

Dated: September 27, 2019

Respectfully submitted,
Joanne N. Lunn,
By her Attorney,

/s/ Honoria DaSilva-Kilgore
Honoria DaSilva-Kilgore, bbo# 564202
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Dated: September 27, 2019

Paula Fruman,
By her Attorney,

/s/ Peter J. Duffy
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